

United States Department of the Interior



IN REPLY TO:

RECEIVED BY U.S. BUREAU OF LAND MANAGEMENT
 AND WILDLIFE SERVICE
 GRIZZLY BEAR RECOVERY COORDINATORS OFFICE
 Great Falls Resource Area
 812 14th Street North
 Great Falls, Montana 59401-2157
 (406) 727-0503

SEP 17 1997

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September 8, 1997

Dr. Christopher Servheen
 U.S. Fish and Wildlife Service Project Leader
 BITTERROOT GRIZZLY BEAR EIS
 P.O. Box 5127
 Missoula, MT 59806

Dear Chris,

The Northern Continental Divide Grizzly Bear Ecosystem Subcommittee (NCDE) members have reviewed the subject EIS and have provided the following insight. Removal of bears from the NCDE to implement your Proposed Action which is to reintroduce bears into the Bitterroot Ecosystem could lessen the chances of recovery for the grizzly in the NCDE.

The proposal allows for the reintroduction of a minimum of 25 bears over a period of 5 years, which means that more than 25 bears could be introduced. The source for the reintroduced bears would be the NCDE, Yellowstone Ecosystem (YE), and British Columbia. Bears taken from the NCDE and YE would count as "man caused removal."

The EIS displays mortality data for the NCDE and the YE, and in the effects analysis it is stated that there would be no effect to the source populations because the recovery plan mortality and population values would be met. It does not say anything about how the trapping would occur or how many bears could be taken out of an ecosystem before the recovery requirements would no longer be met. Some of the numbers and the conclusion in the EIS that the NCDE has been meeting the mortality level, especially for females, are questionable.

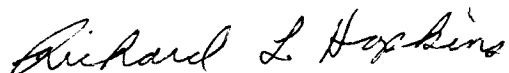
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Population and mortality data are displayed for 1987-96, with adequate years available to determine all needed values for the 1992-96 period. For the 5 years of adequate data, the NCDE failed to meet the female subquota for 2 years and barely made it for 2 more years. If 1 more female, on average per year, had been removed from the NCDE, the female subquota would have missed for 4 out of the 5 years, although the total mortality quota would not have been exceeded. We can give male bears and meet the total mortality level, but it doesn't appear that we can give many females and meet the female subquota.

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The NCDE has implemented many programs in order to reduce mortality and recover the grizzly including road management, interaction with private land owners by specialists such as Tim Manley and Mike Madel, working with the railroad, food storage, removing problem sanitation sites, and a host of other programs. We do not want to stand still or even go backward with this success rate, and that is why we are concerned that use of the NCDE as a source population, prior to delisting, will hinder and extend the timeframe and effort required to recover the NCDE grizzly bear population.

Sincerely,

A handwritten signature in cursive script that reads "Richard L. Hopkins".

Richard L. Hopkins
Chairman, NCDE Subcommittee

cc: NCDE Managers